

## IN THE 31ST JUDICIAL CIRCUIT, GREENE COUNTY, MISSOURI

Judge or Division: MARK A POWELL	Case Number: 2131-CC00618	$R_{ECE}$		
Plaintiff/Petitioner: ROBERT KASPER	Plaintiff's/Petitioner's Attorney/Address JOHN WILLIAM SHIKLES 515 E HIGH ST	JUN 28 2021		
Defendant/Respondent:	vs. JEFFERSON CITY, MO 65102  Court Address:	ERIEL COUNTY		
UNITED PARCEL SERVICE INC  Nature of Suit:  CC Pers Injury-Vehicular	JUDICIAL COURTS FACILITY 1010 N BOONVILLE AVE SPRINGFIELD, MO 65802	(Date File Stamp)		
Alias Summons in Civil Caso				

	Alias Summons in Civil	Case	* .
The State of Missouri to	: UNITED PARCEL SERVICE INC		
<i>.</i>	Alias:		
RA: CSC-LAWYERS INCORPO	PRATING		
SERVICE COMPANY 221 BOLIVAR ST			
JEFFERSON CITY, MO 65101			
COURT SEAL OF	You are summoned to appear before this co	ourt and to file your pleading to the	petition, a
COURTOR	copy of which is attached, and to serve a co		
	plaintiff/petitioner at the above address all v		
(3(76,00)	exclusive of the day of service. If you fail to		fault may
(3)(3)	be taken against you for the relief demande	d in the petition.	
	06/24/2021	/a/Thomas D. Porr by or	
GREENE COUNTY	<u>06/24/2021</u> Date	<u>/s/ Thomas R. Barr by ar</u> Clerk	
	Further Information:	Cicin	V 41 F
	Sheriff's or Server's Return	1	<u> </u>
Note to serving officer:	Summons should be returned to the court within 30 day		
_	I the above summons by: (check one)		
	e summons and a copy of the petition to the defendant/	/respondent	
leaving a copy of the s	ummons and a copy of the petition at the dwelling place	e or usual abode of the defendant/respond	dent with
	, a person of t	he defendant's/respondent's family over th	ne age of
15 years who permar	, a person of the nently resides with the defendant/respondent.		;
	ration) delivering a copy of the summons and a copy of		
	(name)		_ (title).
			·
Served at	· ·	. (a	address)
in :	(County/City of St. Louis), MO, on	(data) at	(time)
""	(County/City of St. Louis), NO, off	(uate) at	(urrie).
Printed Name	of Sheriff or Server	Signature of Sheriff or Server	
Timed Name	Must be sworn before a notary public if not served by an	authorized officer:	
	Subscribed and sworn to before me on		
(Seal)	4		
	My commission expires:		
	My commission expires:	Notary Public	
Sheriff's Fees, if applicabl	e	,	:
Summons	\$		•
Non Est	\$		
Sheriff's Deputy Salary	•		ŧ
Supplemental Surcharge	\$ <u> </u>		
Mileage	\$ ( miles @ \$ per i	mile)	
Total	\$		•
A copy of the summons and	d a copy of the petition must be served on each defend	lant/respondent. For methods of service or	n all 👯
classes of suits, see Suprer	me Court Rule 54.		h

OSCA (06-18) SM30 (SMCC) For Court Use Only: Document Id # 21-SMCC-1457

Civil Procedure Form No. 1; Rules  $54.01 - 54.05_{\odot}^{1}$  54.13, and 54.20; 506.120 - 506.140, and 506.150 RSMo

1 of 1

## IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

ROBERT KASPER,	)	
Plaintiff,	)	
v.	) Case No.	
UNITED PARCEL SERVICE, INC.	JURY TRIAL DEMAND	ED
Defendant.	)	

### **PETITION**

Plaintiff Robert Kasper comes before the court and hereby asserts the following claim for personal injuries against United Parcel Service, Inc.:

- 1. Plaintiff Robert Kasper ("Bob") is a resident of Iberia, Miller County, Missouri.
- 2. Defendant United Parcel Service, Inc. ("UPS") is a foreign corporation with its principal place of business in Atlanta, Georgia.
- 3. On August 30, 2020, Bob was operating a vehicle in a westerly direction on Interstate 44 in Springfield, Greene County, Missouri.
- 4. On or about the same date and time, Dwayne Downing was operating a vehicle in the course and scope of his employment with UPS, Inc. in a westerly direction on Interstate 44, behind Bob.
  - 5. The vehicle operated by Dwayne Downing was owned by UPS.
- 6. On or about said date and time, the front of the UPS vehicle collided with the rear of Bob's vehicle on westbound Interstate 44.
  - 7. Said collision caused injuries to Plaintiff.
- 8. Said collision and the injuries to Bob were due in whole or in part to the negligence of UPS, by and through its employee, Dwayne Downing.

- 9. UPS was negligent in the following respects, to wit:
  - a. Their driver failed to keep a careful lookout;
  - b. Their driver was traveling at an excessive speed; and
  - c. Their driver failed to take evasive action by stopping, slowing, or swerving when it became apparent that a collision was going to occur.
- 10. As a direct and proximate result of the negligence of UPS as aforesaid, Bob suffered permanent and progressive injuries to his right knee and left shoulder that will require surgery in the future.
- 11. As a further direct and proximate result of the injuries, Bob has incurred pecuniary losses including future medical expenses and lost wages.

WHEREFORE, Plaintiff prays for judgment against Defendant United Parcel Service, Inc. in an amount in excess of \$25,000 that is fair and reasonable, determined by a jury, and for their costs herein expended.

Respectfully submitted,

CARSON & COIL, P.C.

Mark A. Ludwig

#31733 #67280

John W. Shikles #67280 515 East High, P.O. Box 28

Jefferson City, MO 65102

573-636-2177

573-636-7119 (fax)

ATTORNEYS FOR PLAINTIFF



# **Notice of Service of Process**

null / ALL Transmittal Number: 23413908

**Date Processed: 06/29/2021** 

**Primary Contact:** SOP UPS - United Parcel

SOP - PowerBrief - Wilmington

251 Little Falls Dr

Wilmington, DE 19808-1674

Electronic copy provided to: **CSC Test** 

> Arlette Willis Bishop Martin Salem Desir Sonja Jackson

**Entity:** United Parcel Service, Inc.

Entity ID Number 2551129

**Entity Served:** United Parcel Service Inc

Title of Action: Robert Kasper vs. United Parcel Service Inc

Matter Name/ID: Robert Kasper vs. United Parcel Service Inc (11356469)

Document(s) Type: Summons/Complaint

**Nature of Action:** Personal Injury

Court/Agency: Greene County Circuit Court, MO

Case/Reference No: 2131-CC00618

**Jurisdiction Served:** Missouri **Date Served on CSC:** 06/29/2021 **Answer or Appearance Due:** 30 Days **Originally Served On:** CSC

**How Served:** Personal Service Sender Information: John W. Shikles

573-636-2177

**Client Requested Information:** Matter Type: Other/NA

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com